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Attorneys for Defendants
ABDULLAH LIMITED COMPANY,
BINOTECH LLC, and HIK TECH LLC

IN THE UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA

JOANNA ARDALAN, ESQ, an
individual; ONE LLP, a California Limited
Liability Partnership,

Plaintiffs,

vs.

BINOTECH LLC; KAREN MUMMERT;
MICHAEL MUMMERT; ABDULLAH
LIMITED COMPANY; CODERS CUBE
LLC; HIK TECH LLC; DATA PATCH,
INC.; DOE 1, d.b.a. LAW INTEGRAL,
LLC, business entity unknown; DOE 2,
d.b.a. DEPUTY TRADEMARK, business
entity unknown; DOE 3, p.k.a.
MICHELLE SPRAGUE, an individual;
DOE 4, d.b.a. TRADEMARK INTEGRAL,
business entity unknown; DOE 5, d.b.a.
BRANDREGISTRATION.ORG, business
entity unknown; and DOES 6 through 10,
inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-DFM

**DECLARATION OF ABDULLAH
KHAN IN SUPPORT OF
MOTION TO SET ASIDE
DEFAULT OF ABDULLAH
LIMITED COMPANY,
BINOTECH LLC, and HIK TECH
LLC (FRCP 55(c))**
[Doc. 50]

U.S. District Judge:
Kenly Kiya Kato
U.S. Magistrate Judge:
Douglas F. McCormick

Courtroom: 3
3470 12th Street, Riverside,
California 92501

Complaint filed: July 12, 2023
Default taken: October 25, 2024

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS:

I, Abdullah Khan, declare:

1. I am the principal of Defendant ABDULLAH LIMITED COMPANY, a
Pennsylvania Limited Liability Company. I could and would testify competently in a

1 court of law to the following if called upon to do so.

2 2. I am a college student at Penn State University, York, PA. I reside in my
3 parents' home located at 2172 Lucy Lane, York, Pennsylvania 17404. No other
4 Defendants reside with me. The business purpose of ABDULLAH LIMITED
5 COMPANY was to develop a customer base for goods and services. A true copy of
6 the Articles of Incorporation appears at Exhibit "2."

7 3. I do not have a web site for ABDULLAH LIMITED COMPANY. The
8 Company's purpose was to acquire turned-in cell phones and then sell them to private
9 parties, and to run ads on TikTok for other companies. None of the ads mentioned
10 Joanna Ardalan.

11 4. Before this lawsuit was filed, I did not know the plaintiff, Joanna
12 Ardalan. I did not place any information about her on any web site, nor did I
13 authorize anyone else to put information about her on any web site. I received no
14 money from anyone associated with Joanna Ardalan or purportedly on her behalf.

15 5. I do not know any person associated with any of the other businesses
16 named as defendants in this lawsuit, except for the two companies owned by my
17 brother, Hamza. I have never heard of these entities. I assure you that none of the
18 other entities reside in my home at 2172 Lucy lane, York, which is my parents' home.
19 These other defendants are using our address fraudulently. I have filed a police
20 report based on the allegations in the complaint that other persons or entities are
21 residing in my home and doing business with me. A true copy of the police report is
22 at Exhibit "3."

23 6. During the summer of 2024, I was contacted by Ms. Ardalan. Since I
24 have done nothing wrong, and I wanted to clear ABDULLAH LIMITED COMPANY
25 from liability, my brother, Hamza Khan and I agreed to speak with her on video
26 zoom. We spoke with her for about 30-40 minutes. She recorded the conference. At
27 the end of the conference she asked for documents. I provided the Articles of
28

1 Incorporation. I have no other documents because the company only sold cell phones
2 and ran some ads for other businesses that were involved in providing mentorship
3 training courses.

4 7. I assumed Ms. Ardalan would dismiss ABDULLAH LIMITED
5 COMPANY from her lawsuit as settlement for having wrongly named my company.
6 When she did not dismiss my company, I filed an answer on behalf of ABDULLAH
7 LIMITED COMPANY. I was surprised when the clerk rejected my answer and said
8 that a company could only appear through an attorney. I then began to look for an
9 attorney.

10 8. Before I was able to retain the law firm of FLYER & FLYER, PLC, I
11 received notice of default from the clerk, which appears at Exhibit "1." I seek to have
12 my default set aside.

13 I declare, under penalty of perjury under the laws of the United States of
14 America, that the foregoing is true and correct and executed at York, Pennsylvania on
15 November 22, 2024.

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17 Abdullah Khan
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